



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

## Concepts for Marine Loading Workshop

Rodeo Senior Center  
August 8, 2002 at 7:00 PM

### **Expand Applicability of the Rules to All Cargoes**

Currently Regulation 8, Rule 44 and Rule 46 apply only to the loading of crude oil, gasoline, and gasoline blending stocks.

Concept: Expand the applicability of the rules to include all loading events that would produce precursor organic compound (POC) emissions.

Basis: Reports and testing have shown that some currently exempt cargoes produce emissions that exceed current standard of 2 pounds per thousand barrels.

### **Lowering Current Emission Standard of 2 Pounds Per Thousand Barrels**

Concept: Lower current emission standard of 2 pounds per thousand barrels. Consider a separate standard for using combustion technology versus recovery technology.

Basis: Results from historical marine vapor recovery tests performed by the District show that vapor recovery at most terminals can achieve an emission limit of 1 pound per thousand barrels.

### **Expand Applicability to Include Housekeeping Activities and Ballasting**

A housekeeping activity is defined as any activity, which would cause the release of organic compounds from a tank vessel into the atmosphere. These activities include but are not limited to tank washing, gas freeing, purging, or tank venting.

Concept: Apply an emission standard to activities such as housekeeping and ballasting that may produce POC emissions.

Basis: Reports and testing have shown that prior load or activity is a large contributor to the emissions generated. The uncontrolled handling of these activities may produce POC emissions above the current standard.

### **Reporting of Marine Loading Activity**

Concept: Report to the District in a timely matter all marine loading activity. Reporting would include information about the vessel(s), time, location, and the specifics of the loading event.

Basis: Without a reporting requirement, it is difficult for District inspection staff to determine compliance of a loading event.